UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK
- x
In re:

MENDEL PANETH,   **Chapter 11**

                                             Case No. 22-41414-nhl

                    Debtor.

- x

DECLRATION RELATING TO PAYMENT OF THIRD-PARTY RETAINER

VICTOR EINHORN makes the following Declaration in support of an application for retention of Corash & Hollender, P.C. as attorneys for the Debtor.

     1.   I am a friend of the Debtor herein. I am the payor of a third-party retainer to Corash & Hollender, P.C., proposed attorneys for the above-captioned debtor and debtor-in-possession.

     2.   I submit this Declaration in support of the application filed by the above-captioned Debtor relating to the retention of Corash & Hollender, P.C. as attorneys for the Debtor in this bankruptcy case.

     3.   I have paid a total of $35,000 in personal funds as a third-party retainer to Corash & Hollender, P.C., for legal fees, costs and expenses to be incurred on behalf of the Chapter 11 bankruptcy filing for the above-referenced Debtor.

     4.   I personally provided the third-party retainer to Corash and Hollender, P.C. in order to secure their services to the Debtor in this Chapter 11 Case.

     5.   Although I have been advised by Corash & Hollender, P.C. to consult with my own counsel, I have not retained independent legal counsel regarding the payment of the aforementioned retainer to Corash & Hollender, P.C.

     6.   I understand that the undivided loyalty of Corash & Hollender, P.C. is to its client, the above-captioned Debtor, and if any conflict arises between the principal and the Debtor, the principal must obtain separate counsel.

     7.   Further, I do not have any intention of asserting a claim against the estate of the Debtor for funds advanced for legal fees in this case.

     8.   Based upon the foregoing, it is my belief that I do not have any adverse interest against the estate of the Debtor herein, or with any creditor or any other party in interest.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on _____6/19_____, 2022

                                             _____
                                             VICTOR EINHORN